

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

4-03

☒ Other ☒ Amendment Number:

000002

Contract Number

EP-D-11-006

Contract Period 04/29/2011 to 03/31/2015

Base

Option Period Number 3

Title of Work Assignment/SF Site Name

Developing Permits by Rule

Contractor

EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW

Purpose



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

From 04/01/2014 To 03/31/2015

Comments

The work plan dated 8/21/14 has been reviewed and we concur with the labor mix, technical hours (1,474), ODCs, total estimated cost \$141,073, and completion date 03/31/15.



Superfund

Accounting and Appropriations Data



Non-Superfund

SFQ
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-GSA.

	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 5)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	State/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period

04/29/2011 To 03/31/2015

Cost/Fee \$0.00

LOE: 0

This Action

\$141,073.00

1,474

Total

\$141,073.00

1,474

Work Plan / Cost Estimate Approvals

Contractor W/P Dated

08/21/2014

Cost/Fee

\$141,073.00

LOE

1,474

Cumulative Approved

Cost/Fee

\$141,073.00

LOE

1,474

Work Assignment Manager Name Mark Sendzik

Branch/Mail Code:

Phone Number 919-541-5534

FAX Number:

(Signature)

(Date)

Project Officer Name Margaret Dougherty

Branch/Mail Code:

Phone Number: 919-541-2344

FAX Number:

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code:

Phone Number:

FAX Number:

(Signature)

(Date)

Contracting Official Name Rodney Varyl Jones

Branch/Mail Code:

Phone Number: 919-541-3112

FAX Number:

(Signature)

(Date)

SEP 09 2014

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

4-03

☐ Other☒ Amendment Number

000001

Contract Number

EP-D-11-006

Contract Period 04/29/2011 To 03/31/2015

Base

Option Period Number 3

Title of Work Assignment/SF Site Name

Developing Permits by Rule

Contractor

EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW

Purpose

☐

Work Assignment

☐

Work Assignment Close Out

☒

Work Assignment Amendment

☐

Incremental Funding

☐

Work Plan Approval

Period of Performance

From 04/01/2014 To 03/31/2015

Comments

The purpose of this change is to add Mary Kissell as an Alternate COR. A revised estimate is not required. No previous work shall be duplicated.

☐

Superfund

Accounting and Appropriations Data

☒

Non-Superfund

SFO
(Max 2)☐

Note: To report additional accounting and appropriations data use EPA Form 1000-65A.

g	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period

Cost/Fee

LOE

04/29/2011 To 03/31/2015

This Action

Total

Work Plan / Cost Estimate Approvals

Contractor WP Dated

Cost/Fee

LOE

Cumulative Approved

Cost/Fee

LOE

Work Assignment Manager Name Mark Sendzik

Branch/Mail Code

Phone Number 919-541-5534

FAX Number

(Signature)

(Date)

Project Officer Name Margaret Dougherty

Branch/Mail Code

Phone Number 919-541-2344

FAX Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

FAX Number

(Signature)

(Date)

Contracting Official Name Rodney-Daryl Jones

Branch/Mail Code

Phone Number 919-541-3112

FAX Number

(Signature)

(Date)

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

4-03

☐ Other ☒ Amendment Number:

000002

Contract Number

EP-D-11-006

Contract Period 04/29/2011 To 03/31/2015

Base

Option Period Number 3

Title of Work Assignment/SF Site Name

Developing Permits by Rule

Contractor

EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW

Purpose:

☐

Work Assignment

☐

Work Assignment Close-Out

☒

Work Assignment Amendment

☐

Incremental Funding

☐

Work Plan Approval

Period of Performance

From 04/01/2014 To 03/31/2015

Comments

The purpose of this work change is to add tasks per the attachment. The contractor shall submit a revised work plan and cost estimate. No previous performed work shall be duplicated.

☐

Superfund

Accounting and Appropriations Data

☒

Non-Superfund

SFO
(Max 2)☐

Note: To report additional accounting and appropriations data use EPA Form 1900-65A.

#	DCN (Max 5)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period

04/29/2011 To 03/31/2015

Cost/Fee

LOE

This Action

Total

Work Plan / Cost Estimate Approvals

Contractor WP Dated

Cost/Fee

LOE

Cumulative Approved

Cost/Fee

LOE

Work Assignment Manager Name Mark Sendzik

Branch/Mail Code:

Phone Number 919-541-5534

FAX Number:

(Signature)

(Date)

Project Officer Name Margaret Dougherty

Branch/Mail Code:

Phone Number 919-541-2344

FAX Number:

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code:

Phone Number:

FAX Number:

(Signature)

(Date)

Contracting Official Name Rodney-Daryl Jones

Branch/Mail Code:

Phone Number 919-541-3112

FAX Number:

(Signature)

(Date)

ATTACHMENT

Work Assignment Title: Developing Permits by Rule
Contract #: EP-D-11-006
Contractor: ERG
WA#: 4-03
WA Change #: 2
WAM: Mark Sendzik

Add the following tasks:

Background: In 2011, EPA established a requirement for true minor sources of oil and natural gas (O&NG) emissions in Indian country to obtain a permit by September 2, 2014, which we subsequently extended to March 2, 2016. For new and modified true minor sources in the oil and natural gas sector proposing to construct after March 2, 2016, permit applications are due no later than March 2, 2016. Because of the number of O&NG sources, due to resource limitations, EPA will be unable to issue site-specific permits in a timely manner and, therefore, is exploring alternative approaches to site-specific permits. To implement the alternative approach, EPA must propose and finalize a rule before March 2, 2016, the permit application deadline. We have been contacted by tribal leaders, industry, an environmental group, and other federal agencies concerning this rulemaking, and anticipate many public comments on the notice of proposed rulemaking phase, including data submittals. We also anticipate the need for outreach to tribes, interactions with other stakeholders, and close coordination with other EPA offices that are part of the overall EPA oil and natural gas sector strategy. We anticipate the rule will be designated Tier 2 and OMB significant. To meet the March 2, 2016, deadline, substantial contractor support will be needed.

The contractor shall not begin Task 11 until receiving Technical Direction (TD) from the WAM to work on the task, in part or in whole.

When this document refers to "states," the states to be considered are: Alaska, Arizona, California, Colorado, Montana, New Mexico, North Dakota, Oklahoma, South Dakota, Texas, Utah, and Wyoming. Michigan may be added through technical direction from the WAM.

Some uncertainties exist as to how EPA will draft the rule. EPA may decide to draft a permit-by-rule, federal implementation plan, general permit, or a combination of these approaches. The contractor should assume one rulemaking package, even if multiple approaches are included.

New Tasks to be accomplished:

5. Plan to be most efficient in face of uncertainty. Contractor shall give the WAM recommendations on the best way to meet the milestones given that EPA will not decide until September 2014, whether to propose a permit-by-rule, a federal implementation plan, or a

general permit (or a combination of approaches), or how existing sources will be addressed. For example, the contractor may recommend a piecemeal approach or may recommend drafting a federal implementation plan or permit-by-rule, knowing that an EPA decision in September could lead to conversion to another format. The WAM will send comments on the plan to the contractor within a week of receipt. The contractor shall revise the plan within a week.

6. Consistency of approaches in cost, emissions and other analyses. The contractor shall review similar work done for various O&NG rules, engine rules, and process heater rules and use them as the starting point for the analyses discussed in the following six tasks, where applicable. Documents for these rules should be available from the WAM or the EPA docket. The contractor shall outline the approach they intend to use for each analyses and highlight if it differs from what has been done on the other rules. The outline can be bullets, or any other format, and needs only to provide enough detail for the WAM to check that the approach is consistent with OAQPS practice.
7. Estimate of controlled and uncontrolled emissions using most current emissions data available. For oil and natural gas activity in Indian country, EPA will provide to the contractor reports that identify oil and natural gas emissions data by basin, by county, by equipment, and by criteria pollutant. The contractor shall review the data, and supplement with available data, as necessary, to develop a memorandum that presents and documents the emissions estimates for: the counties, basins, and reservations; emissions by process phase, such as production facility, and by emission source type, e.g., storage vessel; and emissions by pollutant (including VOC; CO; SO₂; H₂S; NO_x; and PM) if possible, given the available data. The EPA will also provide a map of O&NG minor sources in Regions 6, 8 and 9. This information shall be examined and included in the memorandum, if appropriate.
8. Control options for new and existing sources. The contractor shall review existing data and literature sources such as trade journals, state rules and permits, and existing EPA documents, as necessary. Any information that the WAM currently has will be provided to the contractor within one week of modifying the work assignment. The contractor shall describe the various emission reduction techniques, including pollution prevention alternatives, being used by facilities in the source category. Specifically, the contractor shall identify the control systems used for each emission point and the facilities that use such systems. The contractor shall note which control options would represent BSER/BACT/RACT/LAER/MACT.
9. Number of sources. For each reservation and county, based on guidance on the methodology from WAM, the contractor shall project production for the source category for the next five years, and estimate the number of existing sources and the number of new facilities to be constructed, significantly modified or reconstructed during this five-year time period.
10. Control cost and impact analyses. The contractor shall develop control options to be considered in the rulemaking process. The contractor shall develop estimates of the potential emission reductions achieved through application of the identified control options. The

contractor shall recommend processes, facilities, or pollutants that may not be candidates for regulation due to significant adverse impacts and provide a rationale for this recommendation. The contractor shall estimate the capital and annual costs, and cost per ton of pollutant emission reduction, for the identified control options. The control options should include baseline emissions (i.e., emissions without consideration of the emissions reduction achieved by the general permit/permit-by-rule/federal implementation plan that EPA is developing). The control options should include incremental impacts for the identified control options. The contractor shall estimate any additional environmental and energy impacts associated with the identified control options.

11. Test methods. The contractor shall identify, and recommend, by emission source and type, methods for sampling and analyzing emissions, including the precision and accuracy of each method.
12. Economic analyses. EPA will provide contractor the economic analysis performed for the advance notice of proposed rulemaking, "Managing Emissions from Oil and Natural Production in Indian Country" (79 FR 32502; June 5, 2014). Contractor shall build upon existing advance notice analysis and other analyses provided by EPA to produce economic analysis appropriate for this rulemaking, including small business impacts.
13. State NSR permitting requirements. Identify and compare state approaches to permitting NSR minor sources. Investigate whether permits are pre- or post-construction, and include: notification requirements; timing of notifications and applications; controls required before a post-construction permit is issued and when controls are required; and other requirements such as monitoring, recordkeeping, and reporting. Also include legal authority and whether it counts as a federal new source review permit.
14. Nonattainment. EPA will provide contractor the pollutants emitted by O&NG facilities that are, or that are likely to be, of concern for nonattainment in Indian country. The contractor shall identify state and federal requirements that apply to O&NG minor sources in non-attainment areas for these pollutants.
15. Endangered Species (ESA) and National Historic Support Act (NHPA). The contractor shall provide support for implementation of the ESA and NHPA. The contractor shall identify potential sources of threat from O&NG production due to air pollution, such as uncontrolled emissions, vented emissions, gas and vapor leaks, fugitive emissions, and the effects these sources of air pollution could have on threatened and endangered species, such as deposition, acid rain, increased temperatures, etc. Contractor shall also identify other sources of threat, such as liquid spills, and vibration and noise. For ESA, the contractor shall identify threatened and endangered species living in Indian country where O&NG production is also located. EPA will provide maps indicating these areas. For each endangered or threatened species identified, the contractor shall report how sources of threat could impact threatened and endangered species and whether mitigation is possible. For the NHPA, contractor shall identify sources that are protected by the NHPA that can be found in literature searches; contacting Tribes is not part of this task.

16. Proposed preamble and rule. The contractor shall develop the regulatory package, i.e., the draft preamble and regulation and supporting materials (except the Action Memorandum). The WAM will review the preamble and regulation and supporting materials and provide comments to the contractor within two weeks. The contractor shall provide a revised version of the preamble and regulation and supporting materials to the WAM no later than two weeks from receiving the WAM's comments.
17. Revisions to the regulatory package. The contractor shall revise the regulatory proposal package, i.e., the preamble and regulation and supporting materials, and the background documentation based on comments that the WAM receives from the EPA workgroup (informal review and FAR), EPA management, and the Office of Management and Budget. The contractor shall provide the revised regulatory package no later than one week after receiving comments from the WAM. The WAM will review the revised regulatory package, and if necessary, provide comments to the contractor within one week after receiving the revised regulatory package. The contractor shall then make the necessary revisions and provide them to the WAM no later than one week after receiving the comments from the WAM. Contractor should consider that major revisions may be needed once EPA management gives direction on the format of the rule and whether existing sources will be included in the rule.
18. Background Information Document (BID). The contractor shall develop a background information documentation which presents the general background information and provides the basis for the regulatory action. This documentation shall be referred to as the "Background Information Document (BID)". The contractor shall submit separate chapters/memoranda as they are completed. The WAM will review each chapter/memorandum of the BID and provide comments to the contractor within two weeks. The contractor shall provide a revised version of each chapter/memorandum of the BID to the WAM no later than two weeks after receiving the WAM's comments.
19. Meetings with the workgroup. The contractor shall provide support for 6 meetings during the review process. These meetings will be with the EPA workgroup. Meetings will be in Research Triangle Park, NC, or via teleconference.
20. Docket support. The contractor shall maintain, update, and provide the WAM with an index of docket entries on a monthly basis.
21. Project status meetings. The contractor shall meet with the WAM, as needed, to discuss project status and current issues needing resolution. For the purposes of the work plan, the contractor should estimate meeting, mostly by teleconference, about every other week for 30 minutes.

Milestones

- First draft of preamble and rule (for EPA workgroup review) – 9/4/14
- FAR package – 10/10/14
- OMB package (45-day review) – 12/28/14
- Signature proposal package – 3/20/15

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

4-03

☐ Other ☐ Amendment Number

Contract Number

EP-D-11-006

Contract Period 04/29/2011 To 03/31/2015

Base Option Period Number 3

Title of Work Assignment/SF Site Name

Developing Permits by Rule

Contractor

EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW

Purpose



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

From 04/01/2014 To 03/31/2015

Comments

The work plan dated 04/16/14 has been reviewed and we concur with the labor mix, technical hours (506), CDCs, total estimated cost \$49,304 and completion date 03/31/15. This document is IAW the OMI 1.3.5.1(D)



Superfund

Accounting and Appropriations Data



Non-Superfund

SFO
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-68A.

g	DCN (Max 6)	Budget FY (Max 4)	Appropriation Code (Max 6)	Budget Org Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period 04/29/2011 To 03/31/2015 Cost/Fee \$0.00 LOE 0

This Action \$49,304.00 506

Total \$49,304.00 506

Work Plan / Cost Estimate Approvals

Contractor VAP Dated 04/16/2014 Cost/Fee \$49,304.00 LOE 506

Cumulative Approved Cost/Fee \$49,304.00 LOE 506

Work Assignment Manager Name Mark Sendzik

Branch/Mail Code:

Phone Number 919-541-5534

FAX Number:

(Signature)

(Date)

Project Officer Name ~~Kasson C. Watson~~

MARGARET DOUGHERTY Rnd-9

Branch/Mail Code:

Phone Number 919-541-3114

FAX Number:

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code:

Phone Number

FAX Number:

(Signature)

(Date)

Contracting Official Name Rodney-Daryl Jones

Branch/Mail Code:

Phone Number 919-541-3112

FAX Number:

(Signature)

(Date)

MAY 12 2014

EPAUnited States Environmental Protection Agency
Washington, DC 20460**Work Assignment**

Work Assignment Number

4-03

☐ Other ☐ Amendment Number

Contract Number

EP-D-11-006

Contract Period 04/29/2011 To 03/31/2015

Base

Option Period Number 3

Title of Work Assignment/SF Site Name

Developing Permits by Rule

Contractor

EASTERN RESEARCH GROUP, INC.

Specify Section and paragraph of Contract SOW

II. B

Purpose



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

From 04/01/2014 To 03/31/2015

Comments

This work assignment includes 400 hours for preparation of the work plan and to begin work on the work assignment. This document is INM the CHM 7.3.5.1[D].



Superfund

Accounting and Appropriations Data



Non-Superfund

SFO
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-69A.

	DCN (Max 6)	Budget FY (Max 4)	Appropriation Code (Max 6)	Budget Org Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org Code (Max 7)
1										
2										
3										
4										
5										

Authorized Work Assignment Ceiling

Contract Period

04/29/2011 To 03/31/2015

Cost/Fee

LOE

This Action

Total

Work Plan / Cost Estimate Approvals

Contractor WP Dated

Cost/Fee

LOE

Cumulative Approved

Cost/Fee

LOE

Work Assignment Manager Name Mark Sendzik

Branch/Mail Code

Phone Number 919-541-5534

FAX Number

(Signature)

(Date)

Project Officer Name Karen C. Watson

Branch/Mail Code

Phone Number 919-541-3114

FAX Number

(Signature)

(Date)

Other Agency Official Name

Branch/Mail Code

Phone Number

FAX Number

(Signature)

(Date)

Contracting Official Name Rodney-Daryl Jones

Branch/Mail Code

Phone Number 919-541-3112

FAX Number

(Signature)

(Date)

MAR 25 2011

WORK ASSIGNMENT

- I. TITLE:** Developing Permits by Rule and General Permits for selected source categories in Indian Country
CONTRACT: EP-D-11-006
CONTRACTOR: ERG
WAM: Mark Sendzik, 919/541-5534
Alt WAM: Regina Chappell, 919/541-3650
WA#: 4-03

II. BACKGROUND:

The EPA has finalized a Federal Implementation Plan (FIP) under the Clean Air Act (CAA or Act) for Indian country. The FIP includes two New Source Review (NSR) regulations for the protection of air resources in Indian country. The first rule applies to new and modified minor stationary sources (minor sources) and to minor modifications at existing major stationary sources (major sources) throughout Indian country. The second rule (nonattainment major NSR rule) applies to new and modified major sources in areas of Indian country that are designated as not attaining the National Ambient Air Quality Standards (NAAQS). These rules will be implemented by EPA, or a delegate tribal agency assisting EPA with administration of the rules, until replaced by an EPA-approved implementation plan.

General Permits (GP) and Permits by Rule (PBR) provide a simplified application and issuance process beneficial to qualified applicants and reviewing authorities. GPs and PBRs contain pre-determined control criteria and emission limitations for specific source categories. Participation in the program is voluntary.

Under 40 CFR 49.156(b), EPA finalized provisions for the general permits issuance process in Indian country. These provisions include, among other requirements, that the Reviewing Authority may issue a general permit for a category of emissions units or sources that are similar in nature, have substantially similar emissions, and would be subject to the same or substantially similar requirements governing operations, emissions, monitoring, reporting, and recordkeeping. "Similar in nature" refers to size, processes, and operating conditions.

The EPA will be proposing provisions for a Permit by Rule program for use by tribes in Indian country. A permit by rule (PBR) is a provision of the rules under which a facility or source registers with the Reviewing Authority and meets the specific requirements for that type of source.

The EPA is considering two options for managing emissions impacts from sources in the oil and natural gas sector located in Indian Country: a FIP, which would establish requirements for new and modified minor sources and minor modifications at major sources (and possibly existing sources), but which would not require any preconstruction approval; and a general permit, which is intended to serve as a streamlined permitting approach for new and modified minor sources and minor modifications at major sources under the Indian Country minor source NSR rule.

The work assignment (WA) has two purposes. The first purpose is to develop GPs and PBRs in specific source categories determined by the WAM for use by tribes in Indian country. The second purpose is to develop background information to support the two options EPA is considering for managing oil and gas emissions in Indian country.

III. STATEMENT OF WORK (SOW):

The Contractor shall provide technical support in developing GP and PBR programs for source categories selected by the WAM for use by tribes in Indian country in support of the Tribal Minor NSR Rule (Review of New Minor Sources and Modifications in Indian Country). The WAM shall identify which source categories will receive GPs and which will receive PBRs. The technical expertise provided by the Contractor may include, but is not limited to, developing eligibility criteria, general terms and conditions, and source specific terms and conditions. This expertise may include, but is not limited to, such components as minimum and maximum emissions thresholds of NSR regulated pollutants; minimum and maximum throughput thresholds; emission control requirements; and maintenance, recordkeeping, and reporting requirements. The Contractor shall also develop documents including, but not limited to, initial screening questionnaires, permit applications, and permits for GPs and PBRs for source categories provided by the WAM. The Contractor shall provide documentation supporting the criteria selected to be used in each GP and PBR. If public hearings chaired by the EPA are conducted, the Contractor shall make arrangement for a court reporter and provide the WAM a transcript of the hearings.

The Contractor shall provide background technical support as EPA considers how to manage emissions impacts from sources in the oil and natural gas sector located in Indian Country. The technical expertise provided by the Contractor may include, but is not limited, to characterizing oil and gas activity in EPA Regions, other than Region 8, where there is Indian country and oil and gas production. The characterization may include: characteristics of oil and/gas deposit and/or formation; equipment used in oil and gas production; and predominant air emissions from the oil and gas production activity. The Contractor shall also survey oil and gas regulations on state websites in order for EPA to understand how states are regulating the oil and gas industry. If requested by the WAM, the Contractor shall conduct additional analyses such as required by, but not limited to, the Endangered Species Act and the National Historic Preservation Act.

The WAM is authorized to provide Technical Direction (TD) in accordance with the contract. The Contractor shall not duplicate any work previously performed. The Contractor shall perform the following tasks:

Task 1: Prepare Work Plan

The Contractor shall prepare a work plan within 20 days of the effective date of the WA.

Task 2: Develop General Permits for Use by Tribes in Indian Country

The Contractor shall develop GPs for specific source categories. The WAM will initiate the process by providing technical direction, examples of state programs, and prioritization of work. The Contractor shall develop program eligibility criteria for GPs in designated source categories. The Contractor shall also develop an initial screening questionnaire; permit application form, general permit, and other documents. The Contractor shall provide documentation supporting the

criteria selected to be used in each GP. The Contractor shall revise the GPs and supporting documentation based on comments received through TD by the WAM.

Deliverables under Task 2

- | | | |
|----|--------------------|---|
| 2a | Drafts of two GPs | Within 4 weeks of receiving two source categories specified by the WAM |
| 2b | Revised two GPs: | Within 2 weeks of receiving revisions from WAM |
| 2c | Drafts of two GPs: | After completing first set of GPs, contractor will provide drafts of second set of GPs within 4 weeks of receiving two source categories |
| 2d | Revised two GPs: | Within 2 weeks of receiving revisions of second set of GPs from WAM |
| 2e | Draft of one GP: | After completing second set of GPs, contractor will provide draft of a fifth GP within 4 weeks of receiving an additional source category |
| 2f | Revised one GP: | Within 2 weeks of receiving revisions on the fifth GP from WAM |
| 2g | Final QA Report: | At conclusion of project |

Task 3: Develop Permits by Rule for Use by Tribes in Indian Country

The Contractor shall develop PBRs for specific source categories. The WAM will initiate the process by providing technical direction, examples of state programs, and prioritization of work. The Contractor shall develop eligibility criteria for each designated source category. The Contractor shall also develop an initial screening questionnaire, PBR application, actual PBR, and other documents as directed by the WAM. The Contractor shall provide documentation supporting the criteria selected to be used in each PBR. The Contractor shall revise the PBRs and supporting documentation based on comments received from the WAM and as instructed by the WAM.

Deliverables under Task 3

- | | | |
|----|------------------|--|
| 3a | Draft of one PBR | Within 4 weeks of receiving one source category specified by the WAM |
| 3b | Revised PBR: | Within 2 weeks of receiving revisions from WAM |
| 3c | Final QA Report | At conclusion of project |

Task 4: Develop Technical Information on the Oil and Gas Industry in Indian Country

The Contractor shall provide background technical support as EPA considers how to manage emissions impacts from sources in the oil and natural gas sector located in Indian Country. The technical expertise provided by the Contractor may include, but is not limited to characterizing oil and gas activity in EPA Regions, other than Region 8, where there is Indian country and oil and gas production. The characterization may include: characteristics of oil and/gas deposit and/or formation; equipment used in oil and gas production; predominant air emissions from the oil and gas production activity. The Contractor shall also survey oil and gas regulations on state websites. Through TD by the WAM, the Contractor shall conduct additional analyses such as

required by, but not limited to, the Endangered Species Act and the National Historic Preservation Act.

Deliverables under Task 3

4a Draft of characterization of oil and gas activity	Within 4 weeks of receiving TD from WAM
4b Revised characterization of oil and gas activity	Within 4 weeks of receiving TD from WAM
4c Draft survey of state regulations	Within 4 weeks of receiving TD from WAM
4d Revised survey of state regulations	Within 4 weeks of receiving TD from WAM
4e Final QA Report	At conclusion of project

Task 5: Meeting Support

The Contractor shall participate in conference calls with the CTPG/OAQPS Tribal Team to review and discuss the development of the PBRs, GPs and FIP. In addition, the Contractor shall attend meetings to be held on the EPA campus in Research Triangle Park, NC, for the same purpose.

IV. QUALITY ASSURANCE (QA) REQUIREMENTS

It is the policy of OAQPS that within the constraints of available resources, QA activities shall be conducted to assure environmental data generated, processed or used for its program requirements will be of known quality and will achieve prescribed data quality objectives. Furthermore, the data will be adequate and sufficient for their intended use. If the Contract/Work Assignment (project) involves one or more environmental data operations (EDO is defined as "work performed to obtain, use or report information pertaining to environmental processes and conditions,") then the Contractor shall be in compliance with the EPA Quality Manual for Environmental Programs 5360 AI, May 5 2000 and The American National Standard-Specifications and Guidelines for Environmental Data Collection and Environmental Technology Programs (ANSI/ASQC-E4-1994). The quality assurance policy of EPA requires every EDO to have a written and approved quality assurance project plan (QAPP) prior to the start of the EDO. (NOTE: OAQPS utilizes a four tiered project category approach to its QA Program in order to focus QA. Category I involves the most stringent QA approach, whereas Category IV is the least stringent.)

This project fits within Category IV. The contractor will document the sources of information used in determining eligibility and programmatic criteria in a QA Final Report.

V. REPORTING REQUIREMENTS:

All reports shall be in accordance with contract specifications. In addition, the Contractor shall provide the WAM with draft versions of the deliverables for this WA, and shall revise those versions in response to comments from the WAM. Final versions shall be delivered in hard copy as well as in electronic format through electronic mail or on CDs or DVDs. Electronic files shall be delivered in one of the following software programs: Word (2003 or newer version) and

Adobe Acrobat for documents, Excel (2003 or newer version) for spreadsheet files, and PowerPoint (2003 or newer version) for presentations.